

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

TERRAFORM LABS PTE LTD. and DO
HYEONG KWON,

Defendants.

Civil Action No. 23 Civ. 1346 (JSR)

Hon. Jed S. Rakoff

**NOTICE OF MOTION TO RECONSIDER THE COURT’S ORDER DENYING
DEFENDANTS’ MOTION TO EXCLUDE THE OPINIONS AND TESTIMONY OF DR.
MATTHEW EDMAN**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Evid. 702, Local Civil Rule 6.3, and the Court’s December 4, 2023 Order, which granted Defendants Terraform Labs Pte. Ltd. (“TFL”) and Kwon Do Hyeong request to extend the deadline for filing any motion for reconsideration of the Court’s ruling on the parties’ Daubert motions (ECF No. 130) until four business days after the issuance of a follow-up opinion explaining the reasons for that order, upon the accompanying Memorandum of Law and the exhibits thereto, Defendants respectfully move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at a date and time to be determined by the Court, for an Order reconsidering and vacating the Court’s Order denying Defendants’ Daubert Motion to Exclude Testimony and Opinions of Dr. Edman (ECF No. 97) and granting Defendants’ Daubert Motion to Exclude Testimony and Opinions of Dr. Edman.

Date: January 4, 2024

Respectfully submitted,

/s/Mark G. Califano

DENTONS US LLP

Douglas W. Henkin
David L. Kornblau
Louis A. Pellegrino
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 768-6700
douglas.henkin@dentons.com
david.kornblau@dentons.com
louis.pellegrino@dentons.com

Mark G. Califano
Melissa Gomez-Nelson (admitted *pro hac vice*)
Matthew A. Lafferman (admitted *pro hac vice*)
1900 K Street, NW
Washington, DC 20006
Tel: (202) 496-7500
mark.califano@dentons.com
melissa.gomeznelson@dentons.com
matthew.lafferman@dentons.com

Counsel for Defendant Terraform Labs Pte. Ltd.

/s/ David Patton

KAPLAN HECKER & FINK LLP

David Patton
Michael Ferrara
Andrew Chesley
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Tel: (212) 763-0883
dpatton@kaplanhecker.com
mferrara@kaplanhecker.com
achesley@kaplanhecker.com

Counsel for Defendant Do Hyeong Kwon

CERTIFICATE OF SERVICE

I, Mark G. Califano, certify that I caused a true and correct copy of the foregoing to be served on all counsel of record via the Court's ECF system on January 4, 2024.

/s/ Mark G. Califano
Mark G. Califano